

**DUANE, MORRIS & HECKSCHER**

ATTORNEYS AT LAW

122 E. 42ND STREET, SUITE 3300  
NEW YORK, NY 10108

503 NORTH FRONT STREET  
HARRISBURG, PA 17101-1003

714 CHESTERBROOK BOULEVARD  
WAYNE, PA 19087-5618

968 POSTAL ROAD, SUITE 200  
ALLENTOWN, PA 18109-0450

ONE LIBERTY PLACE  
PHILADELPHIA, PA 19103-7396  
(215) 979-1000

PAX  
(215) 979-1000

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51 HADDONSFIELD ROAD, SUITE 240  
CHERRY HILL, NJ 08002-4810

ONE GATEWAY CENTER, SUITE 1210  
NEWARK, NJ 07102

April 23, 1997

THOMAS J. TUMOLA  
DUANE, MORRIS & HECKSCHER  
E-MAIL: [tumola@duaneheckscher.com](mailto:tumola@duaneheckscher.com)

Federal Election Commission  
999 E Street, N.W.  
Washington, DC 20463

Attention: J.P. Andre'  
Reports Analysis Division

Re: The Society for the Relief of Distressed and Decayed Pilots, Their  
Widows & Children Political Action Committee

FEC I.D. #C00240457

Dear Sir/Madam:

The Pilots' Society PAC received your letter of April 11, 1997 (copy enclosed).

Please be advised that the full name of the Pilots' Society PAC is "The Society for the Relief of Distressed and Decayed Pilots, Their Widows & Children Political Action Committee." The Pilots' Society PAC filed a statement of organization with the FEC on January 5, 1990 and was assigned FEC I.D. #C00240457.

Also, the Pilots' Society PAC files with the FEC periodically Forms 3X, as required by the Federal Election Law and the FEC Regulations. If you require any further information, please contact the undersigned directly.

Sincerely,

  
Thomas J. Tumola  
for DUANE, MORRIS & HECKSCHER

TJT:cam  
Enclosure  
PHI\305125.1



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MS-F

APR 11 1997

Treasurer  
Pilots Society PAC  
P.O. Box 906  
Philadelphia, PA 19105

Dear Treasurer:

This letter is prompted by the Commission's interest in assisting committees which may be subject to the registration and reporting requirements of the Federal Election Campaign Act ("the Act") but are not registered with the Commission.

The Act defines a "political committee" to include 1) any committee, club, association, or other group of persons which receives contributions aggregating in excess of \$1,000 during a calendar year or which makes expenditures for the purpose of influencing any election for federal office aggregating in excess of \$1,000 during a calendar year or 2) any separate segregated fund established by a corporation, labor organization, membership organization, cooperative, or corporation without capital stock which solicits contributions or makes expenditures for the purpose of influencing federal elections. 2 U.S.C. §§431(4) and 441b

A review of the receipts reported by the Borski for Congress Committee indicates that your organization may have made expenditures in excess of \$1,000 during the calendar year 1996 to influence federal elections. The term "expenditures" includes contributions to federal candidates and committees supporting federal candidates. See 2 U.S.C. §431(9). This activity may qualify your organization as a "political committee" subject to the registration, reporting and other requirements of the Act. A copy of the receipt schedule(s) which list your organization's contribution(s) is enclosed for your review.

In order to be in compliance with the Act, your organization must either:

- 1) submit a Statement of Organization and file disclosure reports on FEC FORM 3X (relevant informational materials and forms are enclosed); or

- 2) receive a full contribution refund or direct the recipient committee(s) to transfer the funds to an account not used to influence federal elections.

The second alternative noted above should be followed if your organization does not wish to register and file disclosure reports or if the contributions or expenditures by your organization were from an account containing corporate or union funds.

If you believe that your organization is not a political committee, or the Commission is otherwise in error, please submit documentation which will clarify this matter. Although the Commission may take further legal steps concerning this matter, your prompt action will be taken into consideration.

Please notify the Commission within fifteen (15) days from the date of this letter of your decision on this matter. If you have any questions, please contact me on the agency's toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,



J. P. Ande


Reports Analyst  
Reports Analysis Division

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Enclosures

**Federal Election Commission**  
**ENVELOPE REPLACEMENT PAGE**  
**FOR INCOMING DOCUMENTS**

The Commission has added this page to the end of this filing to indicate how it was received.

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